

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
GREENVILLE DIVISION**

GINNY RICHMOND,

Plaintiff,

v.

WELLS FARGO & COMPANY,

Defendant.

CASE NO. : \_\_\_\_\_

**NOTICE OF REMOVAL**

Wells Fargo Bank, N.A., improperly identified as Wells Fargo & Company (“Wells Fargo”), files this Notice of Removal pursuant to 28 U.S.C. § 1441 and shows the Court as follows:

**INTRODUCTION**

1. On October 12, 2017, Plaintiff Ginny Richmond (“Plaintiff”) filed a Complaint against Wells Fargo in the Court of Common Pleas, County of Greenville, State of South Carolina, Case No. 2017-CP-23-6439 (“State Court Action”). A service copy of the Complaint is attached as Exhibit A.

**GROUND FOR REMOVAL**

2. This Court has original jurisdiction over this matter based on diversity of citizenship.

3. Plaintiff is a resident of Greenville County, South Carolina. (Compl., ¶ 1)

4. Defendant Wells Fargo Bank, N.A. is a national banking association with its headquarters in San Francisco, California.

5. Plaintiff demands actual damages, punitive damages, treble damages, attorneys' fees and consequential damages. (Compl., Wherefore clause) The matter in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and costs.

6. As such, this Court has original subject matter jurisdiction over the action based on diversity of citizenship pursuant to 28 U.S.C. § 1332(a), making the State Court Action removable to this Court pursuant to 28 U.S.C. § 1441(b).

**COMPLIANCE WITH PROCEDURAL REQUIREMENTS**

7. In accordance with 28 U.S.C. § 1441(a), venue of the removal action is proper in this Court because it is in the district and division embracing the place where the State Court Action is pending.

8. In accordance with 28 U.S.C. § 1446(a), the Summons and Complaint served upon Wells Fargo in the State Court Action is attached as Exhibit A.

9. In accordance with 28 U.S.C. § 1446(b), this Notice is being filed with this Court within thirty (30) days after Wells Fargo received the Complaint. The Complaint was filed on October 12, 2017 and served on Wells Fargo on October 16, 2017. See Exhibit A.

10. In accordance with 28 U.S.C. § 1446(d), promptly after the filing of this Notice of Removal, Wells Fargo will give written notice of the removal to the Plaintiffs and will file a copy of this Notice of Removal with the Clerk of Court of Common Pleas, County of Greenville, State of South Carolina.

WHEREFORE, Wells Fargo hereby gives notice that this action is removed to the United States Court for the District of South Carolina, Greenville Division, and requests that it receive such other and further relief to which it may show itself justly entitled at law or in equity.

This 8th day of November, 2017.

*s/ S. Sterling Laney*

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